UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Brock Fredin,	
Plaintiff,	
V.	Case No. 0:20-cv-01929-SRN-HB
Jamie Kreil,	
Defendant.	
Brock Fredin,	
Plaintiff,	Case No. 0:17-cv-03058-SRN-HB
v.	
Lindsey Middlecamp,	
Defendant.	
Brock Fredin,	
Plaintiff,	Case No. 0:18-cv-00466-SRN-HB
V.	
Grace Elizabeth Miller and Catherine Marie Schaefer,	
Defendants.	

JOINT RENEWED MOTION FOR AN ORDER TO SHOW CAUSE

The parties to the above-captioned cases hereby move the Court for an Order (1) holding Brock Fredin in willful contempt of this Court's Order (Dkt. 39); (2) requiring Fredin to show cause why it should not hold him in contempt; (3) imposing a daily fine of \$500 for each posting every day that they remain posted; (4) imposing a daily fine of \$500 for every day that any future abuse is posted; (5) granting the parties to the above-captioned cases' counsel attorney's fees for bringing this motion as well as an upward adjustment from Defendants' original fee petitions (*see* Dkt. 77; 18-cv-466, Dkt 248; 17-cv-3058, Dkt 278), to account for the time counsel spent on Fredin's appeal of this Court's Orders. The grounds for this Motion are set forth in the accompanying Memorandum of Law and Declaration of Anne Lockner.

DATED: December 16, 2021 ROBINS KAPLAN LLP

By: /s/ Anne M. Lockner
Anne M. Lockner (0295516)
J. Haynes Hansen (Bar No. 0399102)
Ena M. Kovacevic (Bar No. 0400149)
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
T: (612) 349-8500
F: (612) 339-4181
alockner@robinskaplan.com
ekovacevic@robinskaplan.com
hhansen@robinskaplan.com

Counsel for Defendant Jamie Kreil

Kutak Rock LLP

By: /s/ K. Jon Breyer
K. Jon Breyer (302259)
60 South Sixth Street
Suite 3400
Minneapolis, Minnesota 55402
T: (612) 334-5057
jon.breyer@kutakrok.com

Counsel for Defendants Lindsey Middlecamp, Grace Elizabeth Miller and Catherine Marie Schaefer